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15 *Attorneys for Plaintiff*

16 *Philadelphia Indemnity Insurance Company*

17 **IN THE UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 PHILADELPHIA INDEMNITY INSURANCE
20 COMPANY, a Pennsylvania Corporation;

21 Plaintiff,
22 vs.

23 RONALD S. JANKOV, an individual; DOE
24 INDIVIDUALS 1 through 10, inclusive; ROE
25 BUSINESS ENTITIES 11 through 20, inclusive;

26 Defendants.

27 Case No.: 2:20-cv-01223-APG-VCF

28 **PHILADELPHIA INDEMNITY
INSURANCE COMPANY and RONALD S.
JANKOV STIPULATION TO CONTINUE
HEARING AND BRIEFING SCHEDULE
ON REQUEST FOR TEMPORARY
RESTRANING ORDER (ECF No. 10)**

19 Plaintiff, Philadelphia Indemnity Insurance Company (“Philadelphia”), by and through its
20 attorneys, The Faux Law Group, and Defendant Ronald S. Jankov (“Jankov”), by and through his
21 attorneys, Dickson Wright PLLC, respectfully request the Court to continue the hearing on
22 Philadelphia’s emergency motion for temporary restraining order (“TRO Request”) scheduled for
23 July 10, 2020 at 10:00 a.m. (ECF No. 10) and establish a briefing schedule as proposed below:

24 1. Philadelphia filed its complaint on June 29, 2020 seeking among other relief that
25 Jankov post collateral security in the amount of \$720,057.75. (ECF No. 1).

26 2. Philadelphia filed its motion seeking the posting of collateral security, temporary
27 restraining order and preliminary injunction on July 13, 2020. (“Motion”). (ECF Nos. 8 and 9).

3. On July 14, 2020, the court issued an order setting a telephonic hearing on Philadelphia's TRO Request for July 21, 2020 at 10:00 a.m. (ECF No. 10). That Order (ECF No. 10) also orders Philadelphia to immediately serve Jankov with the complaint, the emergency motion for temporary restraining order, and the court's order.

4. On Friday July 17, 2020, Michael N. Feder of the law firm of Dickinson Wright PLLC was retained to represent Jankov in this matter.

5. Jankov, through his attorneys, has requested a continuance of the hearing to allow for a reasonable briefing schedule and Philadelphia consents to this request.

6. Additionally, Jankov will authorize Mr. Feder to accept service of process of Philadelphia's complaint, Motion and the court's order, ECF No. 10. While Jankov does not believe there is any basis for the relief requested in the Motion or TRO Request, as part of this stipulation only, Jankov also agrees not to dissipate his assets outside the ordinary course of business pending the court's hearing on the TRO Request.

7. The Parties consent to a new hearing date of August 7, 2020 at 10:00 a.m. (or as soon as the court's schedule allows in that time frame) on the TRO Request.

8. Jankov will submit a Response to Philadelphia's TRO Request on or before Tuesday, July 28, 2020.

9. Philadelphia will submit its Reply to Jankov's Response on or before Monday, August 3, 2020.

DATED this 20th day of July, 2020.

THE FAUX LAW GROUP

/s/ Kurt C. Faux

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10 *Attorneys for Defendant Ronald S. Jankov*

11 **ORDER**

12 Based on the foregoing stipulation, **IT IS HEREBY ORDERED** as follows:

13 1. Jankov shall submit his Response to Philadelphia's TRO Request on or before
14 Tuesday, July 28, 2020;

15 2. Philadelphia shall submit its Reply to Jankov's Response on or before Monday,
16 August 3, 2020; and

17 3. The hearing on the TRO Request presently scheduled for Tuesday, July 21, 2020 at
18 10:00 a.m. (ECF No. 10) is hereby re-set for August 11, 2020 at 10:00 a.m. in Courtroom 6C.

19 The parties and counsel shall appear telephonically by calling the Court conference line at
20 877-336-1831 at least five minutes prior to the hearing. The conference code is 6948860. In order to
21 ensure a clear recording of the hearing, the call must be made using a land line phone. Cell phone
22 calls, as well as the use of a speaker phone, are prohibited.

23 
24 United States District Court Judge

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28 DATED: July 21, 2020